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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 IN RE: CATHODE RAY TUBE (CRT)
17 ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

18 This Document Relates to:

19 *ALL INDIRECT PURCHASER ACTIONS*

**DECLARATION OF WYATT M. CARLOCK
IN SUPPORT OF DEFENDANTS IRICO
GROUP CORP. AND IRICO DISPLAY
DEVICES CO., LTD.'S MOTION IN LIMINE
#7 TO EXCLUDE EVIDENCE OR
INFLAMMATORY LANGUAGE
REGARDING THE GUILTY PLEA BY
SAMSUNG SDI COMPANY, LTD.**

22 Judge: Honorable Jon S. Tigar

1 I, Wyatt M. Carlock, declare as follows:

2 1. I am a member of the bar of the District of Columbia and admitted to practice before
3 this Court *pro hac vice*. I am an attorney with Baker Botts L.L.P., which represents Defendants
4 Irico Group Corporation (“Irico Group”) and Irico Display Devices Co., Ltd. (“Irico Display,”
5 collectively, “Irico” or the “Irico Defendants”) in this action. I make this Declaration in support of
6 Defendant Irico Group Corporation and Irico Display Devices Co., Ltd.’s Motion in Limine #7 to
7 Exclude any Reference to the Guilty Plea Entered into by Samsung SDI Company, Ltd. If called
8 as a witness, I could and would testify to the matters set forth in this declaration of my own
9 personal knowledge.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of the Amended Plea
11 Agreement entered into by Samsung SDI pursuant to Rule 11(c)(1)(C) of the Federal Rules of
12 Criminal Procedure in U.S. v. Samsung SDI Company, Ltd., Case No. CR 11-0162 (WHA), ECF
13 No. 29, dated March 15, 2011.

14 3. Attached hereto as Exhibit 2 is a true and correct copy of excerpts from Samsung
15 SDI Co., Ltd.’s Responses to Dell Plaintiffs’ First Set of Requests for Admission, dated November
16 25, 2013.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed this 11th
18 day of August, 2023, in Arlington, Virginia.

19
20 /s/ Wyatt M. Carlock

21 Wyatt M. Carlock (*pro hac vice*)
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